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November 20, 2020

Honorable Vincent Papalia, U.S.B.J.  
U.S. Bankruptcy Court  
50 Walnut Street, 3<sup>rd</sup> Floor  
Newark, NJ 07102

Re: Estate of Francis Avella  
18-30162  
Chapter 13  
Proceeding: Trustee's Default Certification  
Hearing Date: To Be Determined

Dear Judge Papalia:

Please accept this letter in lieu of a more formal response to the above matter.

The trustee's certification indicates an arrearage of \$4,167.00 is owed through November. This is correct. Unfortunately, the debtor passed away last month after having been gravely ill over the last couple of months.

My office has spoken to debtor's family as of today who indicate that they will be continuing to remit the trustee payments to continue the case and will be curing the aforementioned arrears by November 30<sup>th</sup>. Although not directly related to this matter, the debtor's spouse will also be using insurance proceeds to catch up with mortgage arrears addressed in a pending stay relief motion and to help fund the case going forward as well.

For the foregoing reasons, I respectfully request that the court mark this matter as contested.

Respectfully Submitted,

/s/ HERBERT B. RAYMOND, ESQ.

Herbert B. Raymond, Esq.